

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
BEAUFORT DIVISION**

UNITED STATES OF AMERICA,

v.

RUSSELL LUCIUS LAFFITTE,

Defendant.

Case No.: 9:22-cr-00658-RMG

CONSENT MOTION TO CONTINUE SENTENCING HEARING

Defendant Russell Lucius Laffitte (“Mr. Laffitte”), by and through undersigned counsel and with the consent of the Government, moves for an Order continuing the sentencing hearing currently set for July 24, 2025. *See* ECF No. 396.

As the Court is aware, pursuant to the terms of his plea agreement, Mr. Laffitte agreed to pay \$3,555,884.80 in restitution at or before sentencing. *See* ECF No. 387 at 4. Since the guilty plea hearing on April 14, 2024, undersigned counsel has worked diligently to assist Mr. Laffitte in the liquidation of his assets to pay restitution—and that effort is ongoing but is not complete.

As the Court is aware, at the time of Mr. Laffitte’s plea, his assets were restrained by order of the state court. Shortly after the plea, undersigned counsel began discussions with the Attorney General’s Office to obtain a consent order to lift the freeze imposed on Mr. Laffitte’s assets. Undersigned counsel prepared a consent motion to lift the freeze, but the state prosecutors declined to consent to an order until Mr. Laffitte signed a plea agreement—and the negotiation process unfortunately took longer than anticipated. On July 1, 2025, Circuit Judge Heath P. Taylor signed an order lifting the freeze on Mr. Laffitte’s assets to allow him to liquidate assets to pay restitution.

While awaiting an order from Judge Taylor, undersigned counsel has engaged in multiple discussions with counsel for Palmetto State Bank (“PSB”) about the possibility of PSB’s potential

purchase of all or a portion of Mr. Laffitte's shares of PSB stock. PSB has done its own internal valuation, and discussions with PSB are ongoing. At this time, however, Mr. Laffitte and PSB have not reached an agreement regarding the valuation of Mr. Laffitte's stock.

Mr. Laffitte is also attempting to sell some of his PSB stock—as well as his shares of Bank of America stock—on the open market. However, the sale of his stock is a complex process that involves the assistance of counsel with experience in securities laws and regulations. To assist these efforts, undersigned counsel has associated a lawyer from our Birmingham office. For all of those reasons, Mr. Laffitte respectfully requests a continuance of his sentencing to provide him a reasonable opportunity to sell sufficient assets to pay restitution, in compliance with the terms of his plea agreement.

Undersigned counsel has conferred with Assistant United States Attorney Emily E. Limehouse, who indicated that the Government consents to this Motion. Mr. Laffitte respectfully submits that there is good cause to continue his sentencing and will proceed as expeditiously as possible and with all deliberate speed to complete this process if the Court grants this request.

[signature page follows]

Respectfully submitted,

s/Mark C. Moore

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July 10, 2025
Columbia, South Carolina